

# Delivery and Evaluation of Action Tutoring Secondary Maths Programme

## Privacy Notice for Pupils and their Parents/Carers

### 1 Why are we collecting this data?

Action Tutoring is delivering a maths tutoring programme for pupils in Years 7, 10 and 11, funded by the Education Endowment Foundation (EEF). Selected pupils will receive small-group tuition at the school, delivered by a team of trained volunteer tutors and overseen by an Action Tutoring Programme Coordinator. Tutors deliver tailored tutoring developed by curriculum experts for small-group tuition.

The National Foundation for Educational Research (NFER) in collaboration with the Behavioural Insights Team (BIT) is independently evaluating the impact of the Action Tutoring programme on young people's attainment in, and attitude towards maths. The evaluation will take place between January 2025 and July 2026.

Action Tutoring and NFER are each independent data controllers for purposes of the data covered by this privacy notice. BIT will only use anonymised data to evaluate the effect of differences in the way tutoring is delivered. Action Tutoring's purpose is for the delivery of the programme, NFER's purpose is for the evaluation. When data is archived at the end of the study, EEF are the data controller for the Archive (see Section 5).

### 2 What is the legal basis for processing activities?

The legal basis for processing personal data for the evaluation only is covered by GDPR Article 6 (1) (f):

*Legitimate interests: the processing is necessary for your (or a third party's) legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.*

NFER has carried out a Legitimate interest assessment which demonstrates that the evaluation fulfils one of NFER's core business purposes (undertaking research, evaluation, and information activities). It has broader societal benefits and will contribute to improving the lives of learners by providing evidence about the impact of tutoring on pupil attitudes towards and attainment in maths. Research cannot be done without processing personal data, but NFER will ensure data subjects' data and rights are protected.

The legal basis for processing personal data for the delivery only is covered by GDPR Article 6 (1) (f):

Action Tutoring has carried out a Legitimate interest assessment which demonstrates that the delivery of the programme fulfils Action Tutoring's charitable aims of providing high-quality tuition with measurable impact for pupils facing disadvantage, which cannot be undertaken without processing personal data, but any processing does not override the data subject's interests.

- **Legal obligation:** Additionally, Action Tutoring may need to use or share information it holds about pupils or their parents/guardians in order to comply with a legal obligation, such as to facilitate the investigation of a safeguarding concern with a local authority.
- **Consent:** In order to facilitate any additional processing of information beyond which is outlined in this privacy notice, Action Tutoring will seek consent from the relevant individuals in order to do so.

### 3 How will personal data be obtained?

Action Tutoring will collect details of participating pupils from their school securely and share these with NFER. Action Tutoring will also share with NFER the data it collects on pupils participating in tutoring, including the tutoring sessions they attend. BIT will only use anonymised data to evaluate the effect of differences in the way tutoring is delivered.

Pupil views of tutoring and maths competence will be collected directly from them using online surveys and online maths assessments before and after the programme. These will be administered in school, by Action Tutoring, one of NFER's test administrators or schools, for all pupils taking part in the evaluation.

Pupil focus groups will be conducted in person in a small number of schools by NFER researchers to gather pupils' perspectives on tutoring. You will be contacted in April 2026 if your child is selected to take part in a pupil focus group and given the opportunity to withdraw them.

NFER will also collect data about pupils' school attendance from schools to understand if taking part in the tutoring makes any difference to pupil attendance. For pupils taking part in Year 11, NFER will collect GCSE scores from schools. NFER will also collect Key Stage 2 scores for Year 7 pupils from the National Pupil Database (NPD).

### 4 What personal data is being collected by this project?

The following personal data on pupils will be collected by this project, for the purposes of both delivery and evaluation:

- Name, date of birth, unique pupil number (UPN), gender, year group, class name, Pupil Premium status, access to private tuition, prior attainment (estimated GCSE grade when selected for programme, or key stage 2 attainment level).
- Maths assessment scores for all pupils at the beginning of the programme.
- Year 11 pupils' maths GCSE scores, collected by NFER from the schools and shared by NFER with Action Tutoring.
- Pupil attendance at tutoring sessions (including date of session and mode of tutoring delivery).

In addition, the following personal data on pupils will be collected by this project, for the purposes of evaluation only:

- Maths assessment scores for pupils in Year 7 and 10 at the end of the programme.
- Free School Meal status and Year 7 pupils' key stage 2 maths result from the NPD.

- Pupils' attitude towards maths via *Maths and Me* attitude survey at the beginning and the end of the programme.
- Pupils' views of the programme, if pupils are receiving tuition.

## 5 Who will personal data be shared with?

For the purposes of the evaluation, Action Tutoring and NFER will share the data that is collected on pupils participating in the programme from the schools, as detailed in sections 3 and 4 above. Any personal data shared between Action Tutoring and NFER will be shared securely.

Information about pupils may be shared with specific tutors by Action Tutoring before and during the programme to help them tailor their tutoring sessions (such as full name, school, school year, gender, subject attainment, assessment results, attendance and engagement notes). After a pupil has completed the programme, their final GCSE result in maths may be shared with tutors, but only in relation to those pupils they directly supported.

A summary of anonymous data relating to pupils may be published on the Action Tutoring website and used in published materials, such as Action Tutoring's annual report for funders.

Action Tutoring may share personal data with third parties such as cloud-based software services for the purposes of managing programme delivery. Information about the main software used by Action Tutoring to process data as part of programme delivery can be found below:

- Vedamo (an online tutoring platform) – [www.vedamo.com/privacy-policy](http://www.vedamo.com/privacy-policy)
- FormAssembly (an online form-building platform) – [www.formassembly.com/privacy-policy/](http://www.formassembly.com/privacy-policy/)
- Salesforce (a database) – [www.salesforce.com/company/legal/privacy/](http://www.salesforce.com/company/legal/privacy/)

For the evaluation, personal data will not be shared with any other parties, but anonymised data will be shared with BIT to allow them to evaluate the effect of differences in the way tutoring is delivered.

NFER will produce a publishable report for EEF. No individual or school will be identifiable in NFER's report, unless permission has explicitly been given by the data subject. All of the findings from the evaluation will only be reported in an anonymised form.

Three months after the publication of the final evaluation report (currently planned for summer 2027), pseudonymised matched child-level data will be added to the EEF archive, which is managed by FFT Education on behalf of the EEF and hosted by the Office of National Statistics (ONS). This will enable the EEF and other research teams to use the pseudonymised data as part of subsequent research through the ONS Approved Researcher Scheme. At this point, the EEF will become the data controller and will be responsible for taking decisions about the means and purposes of processing. For further information about the EEF archive and how the EEF processes and uses your data, see the [privacy notice for the EEF archive](#).

The online maths attitude survey data completed by all pupils as part of the evaluation is collected via Tivian, which stores data in the European Union. The privacy notice for Tivian can be found [here](#).

## 6 Is personal data being transferred out of the UK?

NFER only stores personal data in the UK. The exception to this is when use is made of Tivian to administer online surveys, where data is stored in the European Economic Area (EEA)

Personal information held by Action Tutoring may be shared with third parties outside of the European Economic Area (EEA) for the purposes of programme delivery. Any personal information transferred will only be processed on the instruction of Action Tutoring and where this occurs will ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the EEA to a country without an adequacy decision by Action Tutoring, appropriate safeguards will be in place prior to the transfer, including through Standard Contractual Clauses. For the purposes of programme delivery, data is hosted on FormAssembly and a central database, Salesforce. Where tutoring sessions are delivered online, video/audio recordings of tutoring sessions are stored on Vedamo, a secure online tutoring platform. Information relevant to you may also be recorded in other formats, such as in emails, word processing and spreadsheet applications. Information in these formats may be stored on Action Tutoring devices or in Google Workspace applications such as our Google Drive cloud storage.

## 7 How long will personal data be retained?

Action Tutoring seeks to ensure personal data is only retained for the period that it needs it for, or in accordance with laws, regulations and professional obligations that we are subject to. This means that:

- Pupil and parent/guardian records on its central database, Salesforce, containing information provided by our partner schools, alongside additional information we have captured independently, are pseudonymised approximately two academic years after a pupil graduates from the Action Tutoring programme. This involves removal of all information from a record which could be used to identify an individual pupil or their parent/guardian. This process can only be reversed by specific members of the Action Tutoring team and only under reasonable circumstances, such as to facilitate a safeguarding enquiry.
- Video recordings of online tutoring sessions completed on Vedamo are kept for approximately one full academic term after the term in which the session took place.
- The names, results and responses of pupils who completed assessments or surveys using the webform platform, FormAssembly, will be archived approximately two academic years after a pupil graduates from the Action Tutoring programme.
- Action Tutoring's best practice for any pupil and parent/guardian information temporarily stored in other formats, such as word processing or spreadsheet applications, is to delete this information where it is temporarily stored as soon as the purpose for processing the information in the alternative format is complete.
- Pupil records on Action Tutoring's central database and any related parent/guardian information are deleted or permanently anonymised 10 years after pupils graduate from the Action Tutoring programme. Under reasonable circumstances, specific members of the Action Tutoring team can reverse the anonymisation process.

NFER will delete any personal data within one year of publication of the final report, which is scheduled for summer 2027. All personal data held by NFER will be deleted by summer 2028.

## 8 What security is in place for Personal Information shared?

Both Action Tutoring and NFER take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have procedures to handle any potential data security breaches. Data subjects, third parties and any applicable regulators will be notified where we are legally required to do so. If you become aware of a potential data breach involving your personal data, please contact us immediately using the details provided at the end of this notice.

## 9 What are my rights with respect to personal data?

Action Tutoring and NFER handle personal data in accordance with the rights given to individuals under data protection legislation. Under certain circumstances data subjects have the right:

- to request access to information that is held about them (a data subject access request)
- to have personal data rectified if it is inaccurate or incomplete.
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- to restrict processing of personal data (for example, permitting its storage but no further processing).
- to object to processing
- to data portability
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This helps us ensure that personal information is not disclosed to any person who has no right to receive it.

To exercise any of these rights,

- for evaluation, please contact the NFER's Compliance Officer at [compliance@nfer.ac.uk](mailto:compliance@nfer.ac.uk).
- for delivery, please email: [hello@actiontutoring.org.uk](mailto:hello@actiontutoring.org.uk) or write to us at: Action Tutoring, Fivefields, 8-10 Grosvenor Gardens, Victoria, SW1W 0DH. Telephone: 0300 102 0094

Although we value your participation in this evaluation and its contribution to important findings, you can withdraw from the evaluation activities at any time. If you withdraw, unless otherwise instructed, we will use any data we have collected up to that point in our analysis. Note that

withdrawing will not impact on your child's participation in the tutoring programme. If at any time you wish to withdraw from the evaluation activities, or withdraw your data or correct errors in it, please contact your school who will then inform Action Tutoring and NFER.

## 10 Who can I contact about this project?

NFER is responsible for the day-to-day management of the evaluation. Please contact the evaluation team at: [ATEvaluation@nfer.ac.uk](mailto:ATEvaluation@nfer.ac.uk).

For details about the delivery of tutoring, please contact Action Tutoring at: [hello@actiontutoring.org.uk](mailto:hello@actiontutoring.org.uk).

If you have a concern about the way this project processes personal data, we request that you raise your concern with us in the first instance (see details above). If you remain dissatisfied, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at [ico.org.uk/concerns/](https://ico.org.uk/concerns/).

Further information on this project, including information sheets and privacy notices can be found on [NFER's project webpage](#) and [Action Tutoring's project webpage](#).

## 11 Updates

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. The date when this privacy notice was last updated is shown in the footer at the bottom of this document.